



**Pre-Submission Plan Consultation Comment Slip**  
**Consultation Period 7<sup>th</sup> November – 19<sup>th</sup> December 2018**

Name:

Organisation (If applicable):

Address:

Email:

**Your Comments:**

**Context**

These representations are submitted on behalf of Forum Commercial Estates Limited (FCEL), who is a key stakeholder in Blandford. This includes owning a substantial parcel of land off Shaftesbury Lane, Blandford Heights ('the Site'), adjacent to the existing Lidl store.

FCEL is currently looking at potential options for the long-term redevelopment of a site that has long been identified by planning policy as suitable for a mix of uses. It is in this context that these representations are submitted.

**The Proposed Approach of B+NP2**

Draft Policy B3 ('Employment') allocates land off Shaftesbury Lane for employment uses (Class B1 to B8) and such uses are encouraged.

We are generally supportive of draft Policy B3 in so far as it continues to recognise the Site as appropriate for development. However, the proposed approach allows for little flexibility or acknowledgement that other commercial uses can generate employment. Instead the proposed approach of B+NP2 has the potential to prevent the delivery of the Site, meaning that the wider benefits for Blandford associated with its delivery will simply not be realised.

Indeed, whilst the North Dorset District Local Plan (Part 1) (2016) identifies the site for employment purposes (which is typically limited to uses within Class B1 to B8) it does recognise that since the supply of employment land is above projected level of future need, a more flexible approach is adopted and other uses that provide employment, but do not fall within the B Class use definitions, will be permitted (as outlined in paragraph 6.27 of the Local Plan).

As you will be aware, a Neighbourhood Plan is required to be in general conformity with the overarching Development Plan. However, the overall restrictive approach now proposed by draft Policy B3 undermines the approach of the Local Plan.

**Please Continue overleaf or on a separate page.**

You can submit your comments via email, online or through the post.

Via email to: [admin@blandfordforum-tc.gov.uk](mailto:admin@blandfordforum-tc.gov.uk)

Online at: <http://blandfordplus.org.uk/>

By Post to: Town Clerk's Office, Church Lane, Blandford Forum, Dorset, DT11 7AD

This differs from the approach proposed under the earlier iteration of the Neighbourhood Plan, which identified the Site, together with the neighbouring land now developed by Lidl, for a mix of A1 retail, B1/B2/B8 business uses and a C1 Hotel.

When specifically considering this allocation, the Examiner's Report raised no comment or concerns, suggesting that the more flexible approach was appropriate.

Despite the previous approach outlined in the earlier Neighbourhood Plan, and the position of the Examiner, draft Policy B3 of B+NP2 now proposes a more restrictive approach.

The revised approach is inconsistent with the adopted Local Plan and fails to acknowledge the positive contribution other development can have in terms of delivering employment and having a positive impact on economic development. The fact that non-B1 to B8 uses can lead to higher employment is recognised in the proposed wording for development within Sunrise Business Park, also under draft Policy B3 of B+NP2. However, it is not recognised in relation to the Site.

The supporting text to draft Policy B3 (para. 5.34) suggests that the less flexible approach now being advocated reflects the change in circumstances in terms of employment land supply in Blandford. Specifically reference is made to the findings of the B+ Commercial Situation Report (2018). It is suggested that this Report demonstrates that employment land is no longer in excess of projected demand, as was the case when preparing the Local Plan and applying a more flexible approach.

However, in reviewing the evidence underpinning B+NP2 it fails to provide the robust evidence necessary to reach an alternative position. It fails to provide evidence to demonstrate that the position has changed and there is significant demand for employment land that outstrips supply. It also does not justify why a flexible approach (consistent with the adopted Local Plan and previous Neighbourhood Plan) should not continue to be applied for the Site.

Instead, the Report simply provides a very short summary (extending to a single page) of current demand following discussions with the Dorset Chamber of Commerce & Industry together with the commercial departments of local estate agents. This assessment is largely superficial, anecdotal and does not provide the robust evidence required to conclude that the employment land supply position should now differ meaning that the flexible approach of the Local Plan should no longer apply.

Indeed, the Report recognises that the office market is 'poor' for town centre office space. It also identifies that there is no requirement for larger industrial units, although there is some demand for units of 2,000 square feet or less. The Report also suggests that demand in Blandford is constrained by there being 'no ready access to rail services'.

The limited evidence that is provided does not suggest that demand now outstrips supply. Very little weight can be given to the findings of the B+ Commercial Situation Report.

The lack of demand for Class B1 to B8 uses is also reflected by the interest expressed to FCEL in seeking to bring forward development on the Site. Instead, any interest that has been expressed has largely been from other commercial development such as a hotel and retail, rather than traditional B1 to B8 uses.

Given the inadequacies of the B+ Commercial Situation Report, the findings of the 'Bournemouth, Dorset and Poole Workspace Strategy (Workspace Strategy)' which is being used to inform the ongoing North District Local Plan Review, remains the most robust evidence available on the employment land requirements of the area. This identifies that within Eastern Dorset, (which includes the administrative area covered by NDDC and B+NP2) demonstrates that there is sufficient employment land to meet supply. The limited evidence provided within the B+C Commercial Situation Report does not provide the appropriate analysis to now reach a different position and to justify the revised approach for the Site.

**Please Continue overleaf or on a separate page.**

You can submit your comments via email, online or through the post.

Via email to: [admin@blandfordforum-tc.gov.uk](mailto:admin@blandfordforum-tc.gov.uk)

Online at: <http://blandfordplus.org.uk/>

By Post to: Town Clerk's Office, Church Lane, Blandford Forum, Dorset, DT11 7AD

Given this, it remains entirely appropriate to retain flexibility in the wording of draft Policy B3 to enable the potential for other uses, such as a retail or hotel, to come forward as part of a comprehensive mixed use development.

In terms of additional retail floorspace, the recently completed Joint Retail and Commercial Leisure Study (2018), which forms part of the evidence base for the Local Plan Review, identifies a capacity for additional retail floorspace in Blandford Forum as follows:

- **Convenience Goods:** 232 square metres (net) by 2036 (or 191 square metres by 2033 to be consistent with the timeframe of B+NP2).
- **Comparison Goods:** 2,682 square metres (net) of additional comparison goods floorspace by 2036 (or 2,183 square metres by 2033).

No clear opportunities are identified within the strategy of B+NP2 in terms of meeting these needs. The Site provides an opportunity to deliver some retailing. Indeed, local planning policy has long identified the Site as having the potential to accommodate retail development (such as 'saved' Policy 3.2 of the North Dorset district-wide Local Plan (2003)). The recent Lidl development adjacent to the Site further demonstrates the suitability for retailing in this location.

In this context, consistent with the Development Plan, the B+NP2 should continue to identify the site as having the potential for retailing as part of a future mixed use development.

In terms of other commercial uses, such as tourist accommodation, B+NP2 (para. 5.88) recognises that North Dorset area is an important tourist destination and that the supply of tourist accommodation within the settlement boundary will be encouraged. Again, as previously reflected by the earlier Neighbourhood Plan, the Site provides an ideal opportunity to accommodate such a use.

#### **Proposed Revised Approach for Lane at Shaftesbury Lane**

Against this background, we believe that a much more flexible approach, consistent with the Local Plan and the previous Neighbourhood Plan, is required in respect of the future use of the Site.

The Site falls within the settlement boundary and has long been identified as suitable for development and forms an important part of the overall development strategy for Blandford Forum. However, to date the Site remains undeveloped. Therefore, to maximise the prospects of the Site being delivered and the associated benefits that will arise, it is essential that a flexible approach is adopted within the Neighbourhood Plan, consistent with the Local Plan.

In particular we believe that the wording of any policy relating to land at Shaftesbury Lane should recognise that:

- Other uses will be considered for the site, such as a retailing and tourist accommodation subject to satisfying relevant planning policies.
- Recognition that non-B1 to B8 uses can deliver important jobs and represents economic development.

We also believe that further clarity is required in respect of the need to demonstrate that there is no demand for the use of the land for employment purposes. The current proposed wording of draft Policy B3 requires there to be no demand over the Plan period (i.e. up to 2033). This fails to provide any guidance on what constitutes 'no demand'. It may be suggested that whilst there is no demand now, there could be 2033. Consequently, without such guidance there is a danger that the land will simply be safeguarded and not developed, meaning that the tangible positive benefits for the town of development will not be delivered.

**Please Continue overleaf or on a separate page.**

You can submit your comments via email, online or through the post.

Via email to: [admin@blandfordforum-tc.gov.uk](mailto:admin@blandfordforum-tc.gov.uk)

Online at: <http://blandfordplus.org.uk/>

By Post to: Town Clerk's Office, Church Lane, Blandford Forum, Dorset, DT11 7AD

FCEL would like to work with Blandford Forum Town Council and partners about their plans for the Site and see how the proposals could assist in meeting future needs for the town, and make an overall long-term positive impact for the area.

**Please Continue overleaf or on a separate page.**

You can submit your comments via email, online or through the post.

Via email to: [admin@blandfordforum-tc.gov.uk](mailto:admin@blandfordforum-tc.gov.uk)

Online at: <http://blandfordplus.org.uk/>

By Post to: Town Clerk's Office, Church Lane, Blandford Forum, Dorset, DT11 7AD